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September 19, 2024

VIA ECF

The Honorable Renée Marie Bumb
United States District Court
Mitchell H. Cohen Building and U.S. Courthouse
Courtroom 3D
4th & Cooper Streets
Camden, NJ 08101

Re: *In re Valsartan, Losartan, and Irbesartan Liability Litigation*,
Case No. 1:19-md-02875-RMB (D.N.J.)

Dear Chief Judge Bumb:

I write on behalf of the TPP Trial Defendants (“Defendants”) with respect to the date for Defendants’ submission of a response to the TPP Trial Plaintiffs’ Brief Regarding Trial Claims, Damages and MIL 16 (ECF No. [2844](#)). Consistent with the Court’s direction at yesterday’s hearing, Defendants have reviewed Plaintiffs’ brief and ask the Court to allow them until Tuesday, September 24, 2024, to file a response given the need to address: (1) the authorities included in the 18-page case law appendix submitted by Plaintiffs along with their brief; and (2) Plaintiffs’ unanticipated arguments and appendices regarding issues related to scienter and the reliability of IQVIA data.

Defendants have conferred with Plaintiffs on this issue. Plaintiffs do not oppose Defendants’ request to submit their response brief on Tuesday, September 24.

Thank you for your consideration.

September 19, 2024
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Respectfully,

A handwritten signature in black ink, appearing to read "Nina Rose", with a stylized flourish at the end.

Nina R. Rose

cc: All counsel of record (via ECF)